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Investigation by the Department of)	
Telecommunications and Energy and the)	D.T.E. 98-84/
Energy Facilities Siting Board on Their Own)	EFSB 98-5
Motion into a Proposed Alternative Process to)	
the Filing of Long-Range Forecasts Required by)	
G.L. c. 164, § 69I.)	
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I. BACKGROUND

¹ Comments were submitted by: the National Grid companies (“NGrid”), the DG Commenting Parties, NStar Electric Company (“NStar”), Fitchburg Gas and Electric Light Company (“FG&E”), and the Massachusetts Legislature’s Joint Committee on Energy.

² The National Grid companies, the DG Commenting Parties, ISO New England, and NStar Electric Company.

accept reply comments up to October 10, 2002. Tr. at 69. WMECO respectfully submits the following reply comments.

II. COMMENTS

WMECO Supports the Agencies' Alternative Process

WMECO supports the Agencies' proposed alternative process to the requirements of G.L. c. 164, § 69I. The requirements of Section 69I of Chapter 164 would be satisfied by a distribution company filing the annual report ordered by the Department in the distribution company's system reliability docket.³ The other distribution companies have also indicated support for this position. See the comments of FG&E at 3, NStar at 5 and NGrid at 16. The information that WMECO will be providing in these annual reports should be entirely sufficient for the Agencies to evaluate distribution system reliability and the planning process used by the distribution companies. Because this new process is in place, 220 C.M.R. 10.00 *et seq.* is no longer necessary. Accordingly, the 220 C.M.R. rules should be rescinded.

The Distribution System Planning Horizon Should Be Shortened

At the public hearing, NStar and NGrid urged the Agencies to set the distribution system planning horizon for projects at three to five years, rather than the proposed 10 years suggested by the Agencies. Tr. at 18 and Tr. at 61- 62. WMECO is in complete agreement with NStar and NGrid and supports setting the distribution planning horizon for projects at three to five years. Although WMECO uses a 10-year load forecast for distribution planning purposes, WMECO plans distribution system projects on about a three-year basis. This has

³ For WMECO, the Department ordered such a filing in D.T.E. 01-66 (March 28, 2002).

been reflective of the time frame needed for identifying and putting in place distribution system improvements and should be used as part of the proposed alternative process. A time period longer than three to five years would provide little helpful additional information and should not be adopted.

Customer-Specific Information Should Be Kept Confidential

As part of the distribution system planning process, WMECO often receives information from its customers in regard to their future energy use. This allows WMECO to include this information in its forecast. Past practice has been for WMECO to use this information internally and not disclose it publicly. In keeping with past practice, WMECO proposes to keep this information confidential when filing its distribution system plans with the Agencies. WMECO will file the confidential information with appropriate accompanying motions with the Agencies and make a redacted version available for the public record. WMECO's position is similar to NGrid's as stated at the hearing. Tr. at 17.

ISO New England Can Provide Transmission Information

In its initial comments, WMECO suggested that ISO New England or another independent regional transmission entity should be the reporting entity for transmission information. Comments at 8. At the hearing, ISO New England described its annual regional transmission plan ("RTEP") and how the RTEP could meet the Agencies' need for transmission reporting. Tr. at 42 – 56. Given this information, WMECO iterates its support of using the RTEP (or data from other regional plans and planning organizations, when and if they are established) for meeting the transmission requirement of the proposed alternative process.

III. CONCLUSION

WMECO appreciates the opportunity to submit these reply comments. As the Agencies have recognized in their proposed alternative requirements, the requirements of 220 C.M.R. 10.00 *et seq.* are no longer relevant. With respect to distribution planning, the data that distribution companies are scheduled to provide to the Department as a result of the Department's distribution company reliability proceedings will be sufficient to serve as a basis for any review. With respect to transmission, the detailed regional transmission plans developed by the ISO New England (which may, in the future, be developed by other regional organizations) will provide the Agencies with the information needed to discharge their obligations under the existing statutes.